

Dear DOER:

I very much appreciate your efforts to develop these regulations so far. However, after studying the biomass burning issue for over five years as a professional environmental engineer, I am convinced that biomass plants should not receive any subsidies, for a variety of reasons as outlined in my 6/15/2012 *Huffington Post* blog post http://www.huffingtonpost.com/ellen-moyer-phd/burning-trees-to-make-ele_b_1601275.html?utm_hp_ref=green (and which constitute a part of my comments here). Biomass plants in the final analysis have nothing to recommend, in my view.

I know you are not inclined to go as far as I'd like you to and say no to all subsidies. What you can and should do at this juncture is set a much higher bar than in the current draft. Efficiency and forest protection requirements should be much higher and a realistic enforcement plan should be formulated. The draft regulations have been watered down from Ian Bowles' original directive due to industry pressure. Bowles' original criteria should not only be reinstated and honored but strengthened, because more science has come in since that time showing it is more damaging to burn trees than we thought. We need to start reducing carbon dioxide concentrations in the atmosphere now, not 20 years from now. The draft regulations are a baby step, and one only taken after years in the making. We simply can't afford years for each baby step because climate change is happening at a much faster clip. At the very least, please make it a BIG baby step by setting the bar higher. One reason I say it is a baby step is that it allows too much environmental damage still. Another reason is the regulations did not consider all the relevant factors, such as health and economic impacts, which are hugely important.

Many citizens – actually, most, according to a recent survey – don't want biomass plants used as a first resort. People are eager to move to clean, green, and renewable energy (e.g., without smokestacks). And we are tired of paying so much in the form of subsidies. Corporate pork needs to be reduced to give citizens a break and I'm calling on you to do that. This is the perfect kind of place to cut corporate pork because it is unfair and perverse to require citizens to subsidize something that is so diametrically opposed to their own interests.

The whole world is watching. Please make it a bigger step. Thank you again for your efforts.

Very truly yours,

Ellen Moyer, Ph.D., P.E.

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